REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed January 4, 2005. Reconsideration and allowance of the application and pending claims are respectfully requested.

I. Claim Rejections - 35 U.S.C. § 102(b)

Claims 1-5, 8, 11, 16-18 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Gabbe, et al. ("Gabbe," U.S. Pat. No. 4,928,252). Applicant respectfully traverses this rejection.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(b).

In the present case, not every feature of the claimed invention is represented in the Gabbe reference. Applicant discusses the Gabbe reference and Applicant's claims in the following.

Applicant's independent claim 1 provides as follows (emphasis added):

> 1. A method for facilitating generation of a hard copy, comprising:
> selecting a document file written in a first language;
> selecting a translator configured to translate the document file into a second language; and
> ***packaging the document file and the translator together in a job package*** that can be received by a hard copy generation device.

Regarding the limitations of claim 1, Gabbe at least does not teach "packaging the document file and the translator together in a job package". Instead, as is identified in the Office Action, Gabbe teaches:

> When a file to be printed is stored in print data storage unit 22 in a format other than a page description written in a page description language, an appropriate translator module is downloaded from translator storage 32 into print symbiont 28. Print symbiont 28 then transmits the translator module to interpreter 14 to translate the print data file into page descriptions in a page description language. (Gabbe, column 5, lines 35-42)

From the above excerpt, it is clear that Gabbe fails to teach "packaging" a file and a translator together, as is required by claim 1. Instead, Gabbe only mentions downloading a translator to a symboint, which then transmits the translator to an interpreter of a printer. As such, Gabbe does not anticipate each and every limitation of claim 1.

Gabbe is similarly deficient as to Applicant's independent claims 8, 11, and 18. Those claims respectively require "means for packaging the document file and the translator together in a job package that can be received by a hard copy generation device", "receiving a job package comprising a document file representing a document, the document file written in a first language, and a translator configured to translate the document file into a second language", and "means for receiving a job package comprising a document file representative of a document, the document file written in a first language and a translator configured to translate the document file into a second language".

In view of the foregoing, Applicant respectfully asserts that Gabbe does not anticipate Applicant's claims. Therefore, Applicant respectfully requests that the rejection of these claims be withdrawn.

II. Claim Rejections - 35 U.S.C. § 103(a)

A. Rejection of Claims 6, 9, 12-14, and 19-20

Claims 6, 9, 12-14, and 19-20 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Gabbe in view of Dathathraya ("Dathathraya," U.S. Pub. No. 2003/0044009). Applicant respectfully traverses this rejection.

As is identified above in reference to independent claims 1, 8, 11, and 18, Gabbe does not teach packaging a file and a translator together. In that Dathathraya does not remedy this deficiency of the Gabbe reference, Applicant respectfully submits that claims 6, 9, 12-14, and 19-20, which depend from claims 1, 8, 11, and 18, are allowable over the Gabbe/Dathathraya combination for at least the same reasons that claims 1, 8, 11, and 18 are allowable over Gabbe.

As a further matter, with particular reference to claims 14 and 20, neither Gabbe nor Dathathraya teach or suggest "retrieving a decryption key". Regarding the disclosure of Dathathraya, Dathathraya only teaches "accepting a private key" from a SMART card that a user connects to the printer. Nowhere does Dathathraya state that the printer affirmatively "retrieves" a decryption key. Specifically, Dathathraya's printer passively accepts a key, as opposed to actively retrieving the key. See Dathathraya, paragraphs 0033-0035.

B. Rejection of Claims 7, 10, and 15

Claims 7, 10, and 15 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over <u>Gabbe</u> in view of <u>Dathathraya</u> as applied to claims 6, 9, 12-14, and 19-20, and in further in view of <u>Strobel, et al.</u> ("Strobel," U.S. Pat. No. 6,751,732). Applicant respectfully traverses this rejection.

As is identified above in reference to independent claims 1, 8, and 11, Gabbe does not teach packaging a file with a translator. In that neither Dathathraya nor Strobel remedies this deficiency of the Gabbe reference, Applicant respectfully submits that claims 7, 10, and 15, which depend from claims 1, 8, and 11, respectively, are allowable over the Gabbe/Dathathraya/Strobel combination for at least the same reasons that claims 1, 8, and 11 are allowable over Gabbe and Dathathraya.

As a further matter, Applicant notes that Strobel does not teach "appending an address to the job package that identifies the location of a decryption key", as is stated in the Office Action. Instead, Strobel teaches the following:

> In accordance with the present invention, a user logs onto a networked document delivery system using a mobile device and selects a document, message or the like stored on a server to be printed along with a destination printing device in the network for performing the printing. The document server encrypts the document to be delivered to the printing destination, creates a key and stores the encrypted document on the network. The key is sent to the mobile device. The document server sends a pointer, *indicating the location of the document on the network*, to the destination printing device. When the user is physically at the destination printing device, a connection is established between the mobile device and the destination printing device. The mobile device identifies to the printing device the document to be printed and sends the key to the printing device. The printing device, using the pointer,

retrieves the document from the network and uses the key to decrypt the document. The printing device then prints the document. Accordingly, the document will not be printed until the user is present at the printing device to retrieve the document as soon as it is printed. (Strobel, column 2, lines 45-66, emphasis added)

As is apparent from the above excerpt, the Strobel system sends a pointer that indicates the location of the *document* on the network, not the location of a *decryption key*. None of the applied references contains a suggestion that an address of or pointer to a decryption key be provided to or received by a printer.

C.   Rejection of Claims 21-25

Claims 21-25 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Gabbe in view of Strobel. Applicant respectfully traverses this rejection.

As is identified above, Gabbe does not teach packaging a file with a translator. In that Strobel does not remedy this deficiency of the Gabbe reference, Applicant respectfully submits that claims 21-25 are allowable over the Gabbe/Strobel combination for at least this reason.
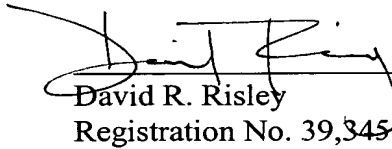
III.   New Claims

As is identified above, claims 26-32 have been added into the application through this Response. Applicant respectfully submits that these new claims describe an invention novel and unobvious in view of the prior art of record and, therefore, respectfully requests that these claims be held to be allowable.
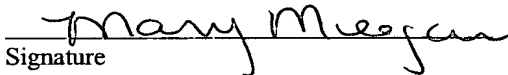
CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

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